

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TEMPLE JUDEA OF BUCKS COUNTY	:	
	:	CIVIL ACTION
v.	:	
	:	No. 08-3768
SELECTIVE INSURANCE COMPANY	:	
OF THE SOUTHEAST	:	

**DEFENDANT, SELECTIVE INSURANCE COMPANY'S**  
**MOTION TO EXTEND DISCOVERY**

1. This lawsuit concerns a claim for flood insurance benefits following an alleged flooding incident that occurred on or about April 15, 2007.
2. On November 12, 2009, the Honorable Petrese Tucker conducted a Rule 16 Conference with counsel to establish the discovery deadlines in this case.
3. Following the conference, Judge Tucker entered an Order directing the discovery be completed within the next 60 days, or by January 12, 2010.
4. The parties have worked together to schedule the depositions of the necessary witnesses in this case; unfortunately, the depositions were not able to completed until February 25, 2010.
5. Accordingly, the Defendants asked the court to extend the deadline for discovery an additional 45 days to complete these depositions.
6. Additionally, the Defendants also ask that the court not refer the case for a settlement conference until after the depositions have been completed.
7. Counsel for the Defendant has spoken to plaintiffs' counsel concerning the instant Motion to extend the discovery deadline and plaintiffs' counsel does not object to this Motion.

8. Accordingly, Defendant, Selective Insurance Company respectfully requests this Honorable Court grant the instant Motion and extend the discovery deadline as set forth in the Proposed Order.

**MARSHALL, DENNEHEY, WARNER  
COLEMAN & GOGGIN**

**Daniel D. Krebbs /s/**  
DANIEL D. KREBBS, ESQUIRE  
Attorney for Defendant

**CERTIFICATION OF SERVICE**

I hereby certify that I have served upon all persons listed below a true and correct copy of  
**Defendant Selective Insurance Company's Motion to Extend Discovery** in the above-captioned matter this date by First Class United States mail, postage prepaid.

Joseph Zenstein, Esquire  
Zenstein, Gallant & Parlow, PC  
One Penn Center - Suite 1270  
1617 JFK Boulevard  
Philadelphia, PA 19103

MARSHALL, DENNEHEY, WARNER  
COLEMAN AND GOGGIN

BY: /s/*Daniel D. Krebbs*  
DANIEL D. KREBBS, ESQUIRE  
Attorney for Defendant

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**ORDER**

AND NOW, this            day of            , 2010, upon consideration of the Defendant's Motion to Extend the Discovery Deadline, it is hereby ORDERED and DECREED that said Motion is GRANTED. The discovery deadline is hereby extended an additional 45 days. Furthermore, this case will not be referred to the Magistrate for a settlement conference until after the depositions have been completed.

BY THE COURT:

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HONORABLE PETRESE TUCKER